

EXHIBIT 73

In the Matter Of:

HENRY vs

BROWN UNIVERSITY

PATRICIA MCWADE

December 08, 2023



1 Q. Does Georgetown still use
2 the Consensus Methodology?

3 A. Yes.

4 Q. Do you know whether any
5 other schools that were members of the
6 568 Group prior to the group's
7 dissolution still use the Consensus
8 Methodology?

9 A. I don't know.

10 Q. Why did the 568 Group
11 dissolve?

12 A. Why did it dissolve?
13 Because the legislation to allow it to
14 continue expired.

15 Q. Between the time that this
16 lawsuit that's the reason why we're
17 sitting here today and the expiration of
18 the exemption, did the 568 Group meet?

19 MS. MILLER: Objection.
20 Form.

21 THE WITNESS: I can't say I
22 completely remember. But that
23 was the period after
24 September 2022 when the

1 at the components of financing higher
2 education.

3 Q. But if you're able to
4 discuss the principles, if you're able to
5 discuss financing higher education with
6 other aid professionals, even when the
7 exemption is expired, why did you need
8 the exemption? Why did you feel that you
9 needed the exemption for the 568 Group to
10 continue existing?

11 Couldn't you have just
12 created the same group -- maybe it
13 wouldn't have been called 568 Group, but
14 a group of the same schools to discuss
15 principles of need analysis?

16 MS. MILLER: Objection.

17 Asked and answered.

18 THE WITNESS: Well, we --
19 we wanted to see if we could
20 agree on how to analyze families'
21 ability to pay. And in the -- in
22 the financial aid jargon amongst
23 ourselves, we would -- we would
24 say, after the exemption expired,

1 oh, we're going to go back to the
2 Wild Wild West where schools
3 would do, you know, what they
4 wanted and very different things.

5 So it helped us to stay
6 focused, I think, on the
7 importance of evaluating the --
8 how to evaluate the components of
9 need analysis.

10 BY MS. BRINN:

11 Q. So it sounds like, and
12 correct me if I'm mischaracterizing your
13 testimony, that the thing that -- that
14 the 568 exemption allowed you to do that
15 you might not be able to do at COFHE was
16 to attempt to reach agreement?

17 MS. MILLER: Objection.

18 Mischaracterizes testimony.

19 THE WITNESS: We didn't
20 really work real hard at that.
21 We worked hard at comparing
22 philosophies on how you treat
23 assets, for example.

24 And the net result might